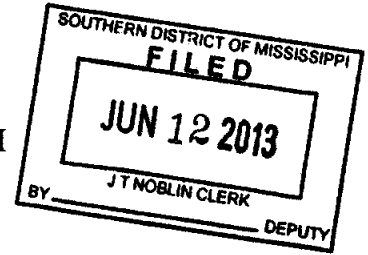


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13cv254 HSO-RHW

JOHN DOE(S) AKA "RANDALL CAJUN"

DEFENDANTS

NOTICE OF REMOVAL

YOU ARE HEREBY NOTIFIED that Defendants, Charles Leary and Vaughn Perret have removed this action from the Circuit Court of Hancock County, Mississippi to the United States District Court for the Southern District of Mississippi, Southern Division. In support of its Notice of Removal, Defendants state:

I.

This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1332, 1441 and 1446.

II.

This action was originally commenced by Plaintiff, Douglas Handshoe, on May 21, 2013 by the filing of the Complaint in the Circuit Court of Hancock County, Mississippi styled *Douglas Handshoe v. John Doe(s) aka "Randall Cajun"*, Cause No: 13-0174. The Summons and Complaint were served on Defendants by service of process upon Charles Leary and Vaughn Perret on June 4, 2013. Pursuant to 28 U.S.C. § 1446(a) a true and correct copy of all process and pleadings served upon Defendants is attached as Exhibit "A"

III.

Pursuant to 28 U.S.C. § 1446(b) this Notice of Removal is being filed and served within 30 days of first receipt by these Defendants, through service or otherwise, of a copy of the initial pleadings setting forth the claim for relief upon which Plaintiff's claims are based.

A complete certified copy of the record on file in Cause No: 13-0174 in the Circuit Court of Hancock County, Mississippi will be separately filed electronically in accordance with L.U.Civ.R. 5(b) within 14 days from the date of removal.

IV.

In the original Complaint Plaintiff names John Doe(s) aka Randall Cajun as the Defendants. Complete diversity exists between the parties since Plaintiff is an adult resident citizen of Hancock County, Mississippi and Defendant, according to the original Complaint, is a fictitious entity. While not naming them as Defendants, Plaintiff served the Summons and Complaint on Vaughn Perret and Charles Leary as though they were named as Defendants; and Vaughn Perret and Charles Leary believe they are intended to be named Defendants.

Defendant Charles Leary is an adult resident citizen of Nova Scotia, Canada; and Defendant Vaughn Perret is an adult resident citizen of Nova Scotia, Canada;

V.

This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1332 and 1441. At the time of the filing of the Complaint and at all times thereafter complete diversity of citizenship has existed between the Plaintiff and Defendants.

VI.

The Plaintiff demands judgment against Defendants for an unspecified amount of money for damages allegedly suffered in an amount exceeding \$75,000.00 exclusive of interest and

costs. The nature of Plaintiff's claims and statements he has made in pleadings in other cases and over the internet indicate that.

VII.

Pursuant to 28 U.S.C. § 1441(a) the United States District Court for the Southern District of Mississippi, Southern Division, is the federal district court for the district and division embracing the place where the state court action was originally filed and pending.

VIII.

Pursuant to 28 U.S.C. § 1446(d) Plaintiff is being provided with a copy of this Notice of Removal, and a copy of this Notice of Removal is being filed with the Clerk of the Circuit Court of Hancock County, Mississippi.

IX.

Consistent with the provision of 28 U.S.C. § 1446(d) no further proceedings shall be had in this matter in the Circuit Court of Hancock County, Mississippi.

Respectfully submitted this the 12 day of June, 2013.

Vaughn Perret and Charles Leary

By:

A handwritten signature in black ink, appearing to read "Henry Laird", is written over a horizontal line.

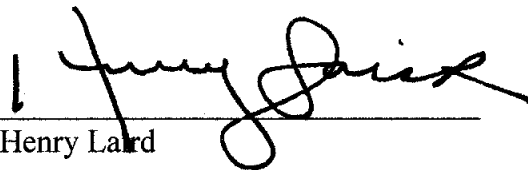
Henry Laird, MS Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have sent a true and correct copy of the foregoing
Notice of Removal to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520

This the 12 day of June, 2013.


Henry Laird

Henry Laird (MSB No. 1774)
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